

### REMARKS

#### Abstract Amendments

In view of paragraph 1 of the Office Action, to respond thereto, applicants have amended the Abstract for purposes of brevity and technical requirement. The amended Abstract comprises less than 150 words.

#### Claim Amendments

The Examiner appears to have misunderstood the invention by failing to realize it is a document **presentation system for a computer display/viewer**. Instead, the Examiner appears to have incorrectly equated the invention to a searching method or system, or methodology therefore. In turn, it is respectfully submitted that the Examiner has misapplied the cited references, as each such reference pertains to a document searching/retrieval method and system. Unlike applicants' invention, neither cited reference is directed, in any respect, to a method or system for presenting a set of documents received from a source, such as a set of email documents received from an ISP/server or a set of websites received from a search engine.

The claims have been amended to clarify the invention. Applicants respectfully request reconsideration and withdrawal of the grounds of rejection of the claims having regard to the following submissions.

#### Applicants' Invention

As stated, applicants' invention is a document presentation system. The system presents documents in very different manner than contemplated in the prior art, namely, by displaying concept identifiers representing concepts/themes and sub-concepts/sub-themes of the content of the documents and arranged according to a prioritized hierarchical structure, with the user being able to drill down from a selected concept identifier to obtain a display of the documents the system has recognized to pertain to that concept/theme or sub-concept/sub-theme.

More specifically, the system includes (a) a concept recognizer component for recognizing concepts/themes and sub-concepts/sub-themes associated with content of the documents; (b) a prioritization analyser component for ordering the recognized concepts/themes and sub-concept/sub-themes, with the documents associated therewith, according to a user's priorities; and (c) a **viewer component** configured for: (1) **presenting on the display** a plurality of first hierarchical level of multiple levels of prioritized concept identifiers interlinked according to a hierarchical structure based on the priority ordering, wherein each concept identifier represents the documents associated therewith and a concept/theme or sub-concept/sub-theme recognized by the concept recognizer; and, (2) upon selection of a concept identifier by the user, **for selectably presenting on the display**, either or both of: (i) a second hierarchical level of the prioritized concept identifiers; and, (ii) particulars identifying the documents associated with the user-selected concept identifier.

#### 35 U.S.C. §102 Rejection

The Examiner has rejected claims 1-5, 8-12 under 35 U.S.C. §102(a) as being allegedly anticipated by **Wical** (U.S. Patent No. 6,460,034).

As dictated by MPEP 706.02, in order for a patent claim to be anticipated by a cited prior art reference it must teach every aspect of the claimed invention either explicitly or impliedly and any feature not directly taught must be inherently present. With respect, applicants submit that **Wical** does not meet this requirement with respect to any claim of this application and, more specifically, does not do so with respect to any of amended claims 1-5 and 8-12. Moreover, **Wical** is not directed in any respect to any document presentation system and pertains to subject matter unrelated to applicants' invention. More particularly, **Wical** does not suggest, point to or otherwise render obvious any of the claims of this application whether considered alone or in combination with any prior art.

As its title and description show, **Wical** discloses a document knowledge base research and retrieval system, and none of **Wical's** disclosure has anything to do with a presentation system or means. As stated in the Summary of the Invention of **Wical**

(see column 2), **Wical's** system processes queries which are input to it. **Wical** identifies from repository of documents for which content information has been stored, in response to a query, those documents which its dual "query processing means" finds to be relevant to the input query. By contrast, applicants' document presentation system does not deal with any such input query and does not search within a repository of documents to match, or otherwise respond to, any such query. Rather, applicants' system receives input documents and it processes those documents to provide a new and non-obviousness output display presentation to the user. The input documents are categorized according to their concepts/themes and sub-concepts/sub-themes and presented to a user, by a prioritized, hierarchical arrangement of concept identifiers representing those concepts/themes and sub-concepts/sub-themes and associated documents. The user selects, for display, a subset of the documents associated with a concept identifier.

**Wical** does not address or teach any means for presenting documents to a user. With respect, it is submitted that **Wical** is, therefore, not relevant to applicants' invention. **Wical** does not comprise any of the foregoing features (a) - (c) of applicants' invention. And, more particularly, **Wical** does not disclose or suggest a viewer component configured for: (1) **presenting on the display** a plurality of first hierarchical level of multiple levels of prioritized concept identifiers interlinked according to a hierarchical structure based on the priority ordering, wherein each concept identifier represents the documents associated therewith and a concept/theme or sub-concept/sub-theme recognized by the concept recognizer; and, (2) upon selection of a concept identifier by the user, **for selectably presenting on the display**, either or both of: (i) a second hierarchical level of the prioritized concept identifiers; and, (ii) particulars identifying the documents associated with the user-selected concept identifier.

Indeed, the only mention by **Wical** of any presentation at all is with respect to Figure 9(c) which pertains only to **Wical's** "concept knowledge base query processing" feature used to identify similar terminology (not any document) (see column 24, lines 33-54). As illustrated in Figure 9(c), for the given concept knowledge base query,

Wical identifies three theme groups, with expanded terms, which it presents in the same manner as the prior art, namely, in a standard output listing format.

Accordingly, for the foregoing reasons, it is evident that the cited reference to Zhilyaev does not anticipate any of the present claims of this application.

35 U.S.C. §103 Rejection

The Examiner has rejected claims 6-7 and 13-14 under 35 U.S.C. 103(a) as allegedly being unpatentable over Wical and further in view of Hyatt (U.S. patent No. 6,678,692).

As dictated in MPEP 2143, in order to establish a *prima facie* case of obviousness, the Examiner must meet three requirements: First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings; second, there must be a reasonable expectation of success; and thirdly, the prior art reference (or references when combined) must teach or suggest all the claim limitations.

With respect to the first requirement, obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. The test for an implicit showing is what the combined teachings, knowledge of one of ordinary skill in the art, and the nature of the problem to be solved as a whole would have suggested to those of ordinary skill in the art. Additionally, the mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. Although a prior art device may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so.

For the reasons already stated above with respect to the cited **Wical** reference and the Examiner's 35 U.S.C. §102 rejection on the basis thereof, and the reasons set out in the following, applicants respectfully submit that **Wical** and/or **Hyatt** do not disclose, teach or even suggest applicants' invention whether viewed alone or in combination. Further, there is no motivation to modify these references to provide the features of applicants' claims.

**Hyatt** provides a system for classifying database records according to a predominant concept. **Hyatt does not address or teach any means for presenting documents to a user.** With respect, it is submitted that, like **Wical**, **Hyatt** is not relevant to applicants' invention. In particular, neither **Wical**, nor **Hyatt**, nor any combination of them, discloses or suggests a viewer component configured for: (1) **presenting on the display** a plurality of first hierarchical level of multiple levels of prioritized concept identifiers interlinked according to a hierarchical structure based on the priority ordering, wherein each concept identifier represents the documents associated therewith and a concept/theme or sub-concept/sub-theme recognized by the concept recognizer; and, (2) upon selection of a concept identifier by the user, **for selectably presenting on the display**, either or both of: (i) a second hierarchical level of the prioritized concept identifiers; and, (ii) particulars identifying the documents associated with the user-selected concept identifier.

In light of the above remarks, applicant submits that the Examiner not, and cannot, establish a *prima facie* case of obviousness with respect to any of the claims presented in this application. Reconsideration of the obviousness rejection is therefore respectfully requested.

#### CONCLUSIONS

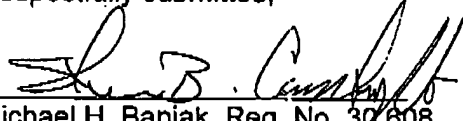
For all the foregoing reasons, applicant respectfully submits that claims 1-14 as amended herein are in good order and ready for allowance. Reconsideration of the Office Action and an early Notice of Allowance are respectfully requested. In the

event that the Examiner cannot allow the present application for any reason, the Examiner is encouraged to contact applicants' attorney to discuss resolution of any remaining issues.

June 14, 2004

Michael H. Baniak  
Baniak, Pine & Gannon  
150 N. Wacker Drive, Suite 1200  
Chicago, Illinois 60606  
(312) 673-0360 Telephone  
(312) 673-0361 Facsimile

Respectfully submitted,

  
Michael H. Baniak, Reg. No. 30,608  
Attorney for Applicants  
Steven B. Courtright, Reg. No. 40,966  
Agent for Applicants